

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

CHARLENE LIBERTY, JOHN DAPONTE,)
JOHN DAVIS, DUANE GOMES, ADAM)
HANRAHAN and CHARLES KENNER,)
on behalf of themselves and all others)
similarly situated; and)
DISABILITY RIGHTS RHODE ISLAND,)
on behalf of its constituents,)
Plaintiffs,)

v.)

C.A. No. 19-cv-0573-JJM-PAS

RHODE ISLAND DEPARTMENT OF)
CORRECTIONS; PATRICIA COYNE-)
FAGUE in her official capacity as the)
Director of the Rhode Island Department of)
Corrections; MATTHEW KETTLE,)
Official Capacity as the Assistant Director of)
Institutions and Operations; and BARRY)
WEINER in his Official Capacity as the)
Assistant Director of Rehabilitation Services)
Defendants.)

DECLARATION OF KASEY M. PEREIRA

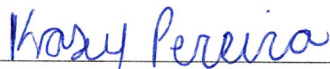
1. I am a paralegal with the firm DeSisto Law, LLC, located at 60 Ship Street, Providence, Rhode Island, 02903, and I have personal knowledge regarding the matters set forth herein.
2. To date, Defendants have produced RIDOC medical records for each of the named Plaintiffs through October 2021 and will continue to supplement.
3. To date, Defendants have produced the medical records of the eleven (11) DRRI “constituents” identified in Paragraph No. 38 of Plaintiffs’ Complaint.
4. To date, Defendants have produced all documents evidencing complaints

regarding medical care raised by Plaintiffs John Daponte, John Davis, and Adam Hanrahan and will continue to supplement.

5. To date, Defendants have produced unit logbooks for the restrictive housing unit(s) in the High Security Center, Maximum Security, John J. Moran Medium Security Facility, Anthony P. Trivisono Intake Service Center, and Gloria McDonald Women's Facility and will continue to supplement.

I declare under penalty of perjury under the laws of the United States of America, 28 U.S.C. § 1746, that the foregoing is true and correct.

Executed on the 6th day of April 2022.



Kasey M. Pereira